

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|-------------------------|---|----------------------------|
| KENDALE J. BRINSON, |) | |
| |) | |
| Plaintiff, |) | 08 C 2420 |
| |) | |
| v. |) | |
| |) | Judge Norgle |
| VERLISHER SYAS, et al., |) | Magistrate Judge Schenkier |
| |) | |
| Defendants. |) | |

**DEFENDANT OFFICERS' AGREED MOTION FOR AN EXTENSION OF
TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S FIRST AMENDED
COMPLAINT**

Defendant Officers Verlisher Syas, C. Blaydes, Gene Alexander, Terrence Williams, and Robert Pet (the "Officers"), by their attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, moves for an extension of time up to and including July 8, 2008, to answer or otherwise plead to plaintiff's First Amended Complaint. In support of this motion, the Officers state as follows:

1. On April 28, 2008, plaintiff filed the current action, alleging constitutional violations against multiple defendants, including the Officers.
2. Plaintiff's First Amended Complaint and summons were served on the Officers on the following dates: Officer Pet, May 9, 2008; Officer Syas, May 10, 2008; Officer Blades, May 11, 2008; Officer Alexander, May 12, 2008; Officer Williams, May 20, 2008.
3. Undersigned counsel was assigned to represent the City of Chicago this matter on June 3, 2008, and was further assigned representation of the Officers on June 10, 2008.
4. Counsel has just begun the process of investigating the allegations in plaintiff's First Amended Complaint.
5. Therefore, counsel requests an extension of time to July 8, 2008, to answer or otherwise plead to plaintiff's First Amended Complaint.
6. Undersigned counsel called plaintiff's counsel on June 10, 2008 to inform her of this motion and she has no objection.

7. This motion is the Officers' first request for an extension of time to answer or otherwise plead. This request is not made for the purpose of delay or for any other improper purpose.

WHEREFORE, the Defendant Officers respectfully request that this Court grant an extension of time up to and including July 8, 2008, to answer or otherwise plead to plaintiff's complaint.

Respectfully submitted,

MARA S. GEORGES
CORPORATION COUNSEL

BY: /s/ Helen C. Gibbons
HELEN C. GIBBONS
Assistant Corporation Counsel

City of Chicago, Department of Law
30 North LaSalle Street, Suite 1020
Chicago, Illinois 60602
(312) 742-3541 Phone
(312) 744-3989 Fax
Attorney No. 6292881

CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing Motion and Notice of Motion to be served upon all parties of record pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 13th day of June, 2008.

/s/ Helen C. Gibbons
HELEN C. GIBBONS